

EXHIBIT 1

**STATE OF NEW MEXICO
COUNTY OF SANTA FE
FIRST JUDICIAL DISTRICT**

No. D-101-CV-2015-01725

**IN THE MATTER OF THE ESTATE OF
JAY POSNER, deceased.**

**PETITION FOR INFORMAL APPOINTMENT OF PERSONAL REPRESENTATIVE
UNDER THE WRONGFUL DEATH ACT**

Lee Hunt, Esq., Petitioner, through his attorneys of record at the Parnall Law Firm and pursuant to NMSA 1978 §§ 41-2-1 to 4 and 45-1-302(C), petitions the Court for his informal appointment as Personal Representative of the Estate of Jay Posner, deceased, solely for purposes of pursuing a lawsuit under the New Mexico Wrongful Death Act in the courts of New Mexico. In support of this Petition, Petitioner states the following:

1. This Court has jurisdiction over this matter pursuant to the Wrongful Death Act, NMSA 1978 §§ 41-2-1 to 4 and NMSA § 45-1-302(C), which grants original jurisdiction to the district courts for proceedings for the informal appointment of a personal representative for purposes of pursuing a wrongful death action.

2. Jay Posner died on August 26, 2012 at the age of 71. At the time of his death, Mr. Posner was domiciled in Lyons, Colorado. Mr. Posner died unexpectedly when he was rear-ended while in his car on Interstate 40 in Guadalupe County, New Mexico.

3. Mr. Posner is survived by his daughter, Cindy Posner, who, upon information and belief, is the sole beneficiary of any proceeds recovered under the Wrongful Death Act.

5. Cindy Posner concurs in this Petition, which was mailed to her on July 24, 2015.

6. Petitioner, Mr. Hunt, is a resident and domiciliary of Santa Fe, Santa Fe County, New Mexico.

7. Venue is proper in this Court for this Petition.

8. Petitioner seeks appointment as personal representative pursuant to the Wrongful Death Act only for purposes of bringing a wrongful death lawsuit.

9. Any proceeds from a wrongful death case will be distributed pursuant to the personal representative's fiduciary duties in accordance with the Wrongful Death Act.


10. Petitioner is a qualified person as defined by the laws of the State of New Mexico, NMSA 1978, § 45-3-203(F) and is in no manner disqualified to serve as the personal representative of the wrongful death lawsuit.

11. Petitioner is advised of his fiduciary duties to the Estate and to any beneficiaries under the Wrongful Death Act. Without financial interest in the outcome of the case, he is able to represent those interests on behalf of the deceased in an unbiased manner.

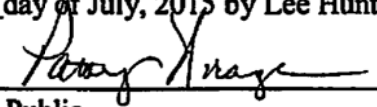
12. This Petition is timely pursuant to NMSA 1978, § 45-3-108, which provides a three-year window for the appointment of a personal representative following a decedent's death.

13. The statements made in this Petition are true to the best of Petitioner's knowledge and belief.

WHEREFORE, Petitioner Lee Hunt, Esq. respectfully requests that the Court issue an order appointing him as the personal representative to pursue the wrongful death claims, under the Wrongful Death Act, of Jay Posner.


Lee Hunt, Petitioner

SUBSCRIBED and SWORN before me this 24th day of July, 2015 by Lee Hunt.

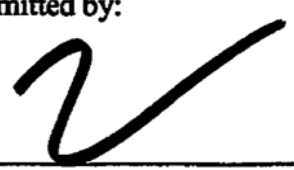


Notary Public

My commission expires:

09.23.2017

Submitted by:



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